

EXHIBIT 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

GLOBAL EQUITY MANAGEMENT)
(SA) PTY. LTD.,)
Plaintiff,)
) Civil Action No. 2:15-cv-00095
v.) LEAD CASE
)
EXPEDIA.COM AND) JURY TRIAL DEMANDED
EXPEDIA, INC.,)
Defendants.)

OPPOSED MOTION TO WITHDRAW AS COUNSEL

Plaintiff Global Equity Management (SA) Pty. Ltd.'s ("GEMSA") counsel William Ramey of Ramey & Schwaller, LLP and Buffy Martines of Laminack, Pirtle, & Martines, LLP, and their respective firms, respectfully requests that William P. Ramey, III and Buffy Martines be permitted to withdraw as counsel of record for GEMSA in the above-captioned matters and that ECF notifications to them be terminated in connection with this case.

1. I, William P. Ramey, III, after assisting GEMSA through the litigation activities, notified Schumann Rafizadeh ("Rafizadeh") on June 2, 2017, that I would be filing a motion to withdraw as counsel on or about June 15, 2017.
2. I forwarded copies of the motions to withdraw to Mr. Rafizadeh of GEMSA on June 13, 2017.
3. Rafizadeh did not respond to the communication. However, on June 14, 2017, Rafizadeh's new counsel Ed Rothberg of Hoovers Slovacek sent a letter terminating the engagement effective 30 days from June 14, 2017, i.e. July 14, 2017.
4. William P. Ramey, III of Ramey & Schwaller, LLP and Buffy Martines of

Laminack, Pirtle, & Martines, LLP move the Court for permission to withdraw as counsel of record for GEMSA as GEMSA has not fulfilled their obligations under the engagement agreement with Ramey & Schwaller, LLP and Laminack, Pirtle, & Martines, LLP and due to a breakdown in communication and understanding between Ramey & Schwaller, LLP, Laminack, Pirtle, & Martines, LLP, and GEMSA as to the purpose and meaning of legal representation. For these reasons, it is impossible for Ramey & Schwaller, LLP and Laminack, Pirtle, & Martines, LLP to effectively represent GEMSA in this matter.

5. William P. Ramey, III of Ramey & Schwaller, LLP and Buffy Martines of Laminack, Pirtle, & Martines, LLP have taken reasonable steps to avoid any foreseeable prejudice to the rights of GEMSA. A copy of this motion has been provided to GEMSA and GEMSA is aware that it needs to retain private counsel as GEMSA cannot represent itself.
6. William P. Ramey, III has notified GEMSA of the case status and will send Rafizadeh a 30-day docket if the Court grants this motion.
7. William P. Ramey, III of Ramey & Schwaller, LLP and Buffy Martines of Laminack, Pirtle, & Martines, LLP stand ready to deliver to GEMSA all papers and property to which the client is entitled.
8. The last known address for GEMSA is 458 Morphett Road, Warradale, South Australia 5046. The address for GEMSA's new counsel is Hoover Slovacek, 5051 Westheimer, Suite 1200, Houston, Texas 77056.

The withdrawal of Mr. Ramey and Ms. Martines, and their respective firms, will not have

a detrimental effect on GEMSA or its representation in this case, nor will it cause any delay in this proceeding or prejudice any party as the cases are presently stayed and there are no current docket dates. Accordingly, there is adequate time for GEMSA to obtain new counsel. Further, GEMSA has new counsel at least in Texas.

For clarity withdrawal is sought in cause numbers:

1. 2:15-cv-1700;
2. 2:15-cv-1703;
3. 2:16-cv-95;
4. 2:16-cv-96;
5. 2:16-cv-99;
6. 2:16-cv-101; and,
7. 2:16-cv-102.

The undersigned has conferred or attempted to confer with counsel for Defendants. Defendants either oppose this request or have not responded with non-opposition.

Respectfully submitted,

Ramey & Schwaller, LLP

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Attorneys for GEMSA

CERTIFICATE OF CONFERENCE

I certify on July 3, 2017, I conferred via e-mail with counsel for Defendants in the consolidated cases asking whether they were opposed to a motion to withdraw as counsel. As of the filing of this Motion, no responses of non-opposition have been received. Accordingly, this Motion is filed as opposed.

/s/ William P. Ramey, III
William P. Ramey, III

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record who have appeared in this case are being served today with a copy of the foregoing via the Court's CM/ECF system.

/s/ William P. Ramey, III
William P. Ramey, III